

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

Wells Fargo Bank, National Association,)	Civil Action No. 3:16-1296-MBS
)	
Plaintiff,)	
)	
vs.)	IDENTIFICATION OF EXPERT(S) AND
)	CERTIFICATION OF WRITTEN REPORT
Stewart Title Guaranty Company,)	AS REQUIRED BY THE SCHEDULING
)	ORDER
Defendant.)	
_____)	

Plaintiff Wells Fargo Bank, National Association designates the following expert witnesses:

- (a) Thomas E. Lydon, Esquire
McAngus Goudlock & Courie, LLC
1320 Main Street
Meridian, 10th Floor (29201)
P.O. Box 12519 (29211)
Columbia, South Carolina
(803) 227-2292

- (b) Frank B.B. Knowlton
Nelson Mullins Riley & Scarborough
1320 Main Street
Meridian Building (29201)
P.O. Box 11070 (29211)
Columbia, South Carolina
(803) 255-9588

(Mr. Knowlton would primarily be called as a fact witnesses, but would be qualified to render an expert opinion and testify based on his involvement in this matter and based on the documents in the file, including those listed above, that is his opinion that Wells Fargo acted reasonably in accepting the negotiated settlement in this matter in order mitigate its damages since it was in a third mortgage position, and not in the position represented in the Title Commitment and in the Title Policy issued by Stewart Title; that the actions of Wells Fargo did not violate provisions of the insurance contract with Stewart Title; that Stewart Title has breached its contract by not paying for the loss of Wells Fargo in the Riber matter and; that Stewart Title is guilty of bad faith in its refusal to pay the claim of Wells Fargo.)

Plaintiff Wells Fargo Bank, National Association, through its undersigned counsel, certifies that the above named experts have prepared and signed reports, which include the information required by Fed. R. Civ. P. 26(a)(2) (B). This has been served and been disclosed to counsel for Stewart Title Guaranty Company, the other party in this action.

s/ R. Davis Howser
Federal I.D. No. 1984
of HOWSER, NEWMAN & BESLEY, LLC
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December 19, 2016